



Your business
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 17, 2014

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2014 ETC Annual Report of Grand Telephone Company, Inc.
Study Area Code 431994**

Dear Ms. Dortch:

On behalf of Grand Telephone Company, Inc. (“Grand”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ Grand seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.202(a).

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

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FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Jason Anderson
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	jsanderson@grand.net

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
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<100>	Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310>	Detail on Attempts (voice)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410>	Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440>	Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450>	Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	431994ok510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	431994ok610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>		(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100>	Terrestrial Backhaul (Y/N)?	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>		(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(100) Service Quality Improvement Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	Jason Anderson 9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jeanderson@grand.net

<110>	Has your company received its ETC certification from the FCC?	<input type="radio"/> (yes) <input checked="" type="radio"/> (no)
<111>	If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<input type="radio"/> (yes) <input type="radio"/> (no)

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets
<114>	Report how much universal service (USF) support was received
<115>	How (USF) was used to improve service quality
<116>	How (USF) was used to improve service coverage
<117>	How (USF) was used to improve service capacity
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.

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[illegible]

FCC Form 481

OMB Control No. 3060-0986 / OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	j.sanderson@grand.net
<810>	Reporting Carrier	Grand Telephone Company
<811>	Holding Company	
<812>	Operating Company	

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

<910>

Tribal Land(s) on which ETC Serves

Cherokee Nation

<920>

Tribal Government Engagement Obligation

431994ok920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

Select
(Yes,No,
NA)

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

<921>

Needs assessment and deployment planning with a focus on Tribal community anchor institutions.

<922>

Feasibility and sustainability planning;

<923>

Marketing services in a culturally sensitive manner;

<924>

Compliance with Rights of way processes

<925>

Compliance with Land Use permitting requirements

<926>

Compliance with Facilities Siting rules

<927>

Compliance with Environmental Review processes

<928>

Compliance with Cultural Preservation review processes

<929>

Compliance with Tribal Business and Licensing requirements.

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jaanderson@grand.net

☐

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

(1200) Terms and Condition for Lifeline Customers		FCC Form 481	
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819	
Data Collection Form		July 2013	

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans		Name of Attached Document
--------	--	--	---------------------------

<1220>	Link to Public Website	HTTP	http://grand.net/service_telephone.html
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"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2000) Price Cap Carrier Additional Documentation		FCC Form 481	
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819	
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>		July 2013	

<010>	Study Area Code	431994	
<015>	Study Area Name	GRAND TEL CO INC	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson	
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	janderson@grand.net	

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

	Incremental Connect America Phase I reporting	
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}	<input type="checkbox"/>
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}	<input type="checkbox"/>
	Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}	
<2012>	2013 Frozen Support Certification	<input type="checkbox"/>
<2013>	2014 Frozen Support Certification	<input type="checkbox"/>
<2014>	2015 Frozen Support Certification	<input type="checkbox"/>
<2015>	2016 and future Frozen Support Certification	<input type="checkbox"/>
	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}	
<2016>	Certification Support Used to Build Broadband	<input type="checkbox"/>
	Connect America Phase II Reporting {47 CFR § 54.313(e)}	
<2017>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2018>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	
<2021>	Interim Progress Community Anchor Institutions	<div></div>

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation
Data Collection Form

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	janderson@grand.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(ii))	<div style="border: 1px solid black; width: 200px; height: 50px; margin: 0 auto;"></div>	Name of Attached Document Listing Required Information
(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>	
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))	<div style="border: 1px solid black; width: 200px; height: 50px; margin: 0 auto;"></div>	Name of Attached Document Listing Required Information
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<input checked="" type="radio"/>	(Yes/No)
(3014)	If yes, does your company file the RUS annual report	<input checked="" type="radio"/>	(Yes/No)
Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input checked="" type="checkbox"/>	
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/>	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	<div style="border: 1px solid black; width: 200px; height: 50px; margin: 0 auto;"></div>	Name of Attached Document Listing Required Information
(3018)	If the response is no on line 3014, Is your company audited?	<input type="radio"/>	(Yes/No)
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<input type="checkbox"/>	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit.	<input type="checkbox"/>	
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<input type="checkbox"/>	
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>	
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>	
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3026)	Attach the worksheet listing required information	<div style="border: 1px solid black; width: 200px; height: 50px; margin: 0 auto;"></div>	Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jeanderson@grand.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	431994
<015> Study Area Name	GRAND TEL CO INC
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035> Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Diane Longenecker</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	<u>Diane Longenecker</u>
Name of Reporting Carrier:	<u>GRAND TEL CO INC</u>
Signature of Authorized Officer:	<u>CERTIFIED ONLINE</u> Date: <u>06/16/2014</u>
Printed name of Authorized Officer:	<u>Jason Anderson</u>
Title or position of Authorized Officer:	<u>Co-Manager</u>
Telephone number of Authorized Officer:	<u>9182534231 ext.</u>
Study Area Code of Reporting Carrier:	<u>431994</u> Filing Due Date for this form: <u>06/30/2014</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	<u>GRAND TEL CO INC</u>
Name of Authorized Agent or Employee of Agent:	<u>Diane Longenecker</u>
Signature of Authorized Agent or Employee of Agent:	<u>CERTIFIED ONLINE</u> Date: <u>06/16/2014</u>
Printed name of Authorized Agent or Employee of Agent:	<u>Diane Longenecker</u>
Title or position of Authorized Agent or Employee of Agent	<u>Manager - Regulatory Affairs</u>
Telephone number of Authorized Agent or Employee of Agent:	<u>5123380473 ext.235</u>
Study Area Code of Reporting Carrier:	<u>431994</u> Filing Due Date for this form: <u>06/30/2014</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

REDACTED – FOR PUBLIC INSPECTION

GRAND TELEPHONE COMPANY, INC. (SAC 431994)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

Grand Telephone Company, Inc.

Study Area Code 431994

Response to Line 510 - Service Quality Standards and Consumer Protection Rules

Compliance – Voice and Broadband Service

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Grand Telephone Company, Inc. (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with current service quality and consumer protection provisions under state and federal law. These provisions include, but are not limited to, the following: 1) the minimum directory requirements (OAC 165:55-7-1(e) (1); 2) the Truth-in-Billing rules 47 C.F.R. § 64.2401, as required in the OCC

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

rules at OAC 165:55-9-1; 3) CPNI rules, Red Flag rules and other applicable federal and state requirements governing the protection of customers' privacy.

For its broadband service, Company hereby certifies that while there are no applicable state broadband service quality standards and consumer protection rules yet established under the Oklahoma Administrative Code, the Company discloses rates, terms and conditions on its public web site and the Company complies with federal and state customer protection standards generally applicable to all businesses operating in Oklahoma. In addition, the Company adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in 47 C.F.R. Part 8 §8.3.

Grand Telephone Company, Inc.

Study Area Code 431994

**Response to Line 610 - Ability to Function in Emergency Situations for Voice and
Broadband**

Grand Telephone Company, Inc. (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2).¹ The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the Company is able to function under emergency operations in accordance with Title 165, Chapter 55 of the Oklahoma Corporation Commission (OCC) regulations, which include the following subparts specific to emergency operations and adequacy of equipment:

1. 165:55-13-20. Responsibility for adequate and safe service
2. 165:55-13-22. Emergencies
3. 165:55-13-23. Adequacy of service
4. 165:55-13-24. Adequacy of equipment
5. 165:55-13-50. Service standards; sufficient operating and maintenance force
6. 165:55-13-53. Restoration of service plan

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

These rules require telecommunications service providers to maintain their networks and facilities so as to render safe, efficient, and continuous service, and to make adequate provision for emergencies in order to prevent interruption of continuous telecommunications service. The OCC rules also require that telecommunications service providers equip their central office facilities with an emergency power source, either on the premises or available on short notice. Finally, the OCC rules require all telecommunications service providers to have a written restoration of service plan, available for review upon request. The Company complies with all of the aforementioned OCC rules and federal regulations.

While these regulations do not specifically apply to broadband providers and services, the Company's Restoration of Service Plan and emergency power and facilities support both voice and broadband network equipment in the event of an emergency situation.

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(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	431994
<015>	Study Area Name	GRAND TEL CO INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jason Anderson
<035>	Contact Telephone Number - Number of person identified in data line <030>	9182534231 ext..
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsanderson@grand.net

1/1/2014
14.52

	Residential Local Service Charge Effective Date	Single State-wide Residential Local Service Charge
<701>		
<702>		

<703>

[illegible]

Grand Telephone Company, Inc.

Study Area Code 431994

Response to Lines 920 – Tribal Lands Reporting

Grand Telephone Company, Inc. (“Company”) serves the Cherokee Nation located in northeastern Oklahoma. The Company’s outreach efforts per the requirements of 47 C.F.R. §54.313(a)(9), are outlined in the attached summary and correspondence documents.

January 9, 2013

Subject: Meeting with Cherokee Nation

Charles Head Secretary of State for Cherokee Nation

On January 8th 2013, Jacob Weise and I met with Charles Head, Cherokee Nations Secretary of State concerning the tribal engagement and FCC certification requirements stemming from the FCC's USF/ICC Transformation Order. Our meeting was scheduled to discuss the template draft provided by JSI on the Public Notice issued by the Office of Native Affairs and Policy (ONAP). In opening our discussion with Mr. Head I informed him that Grand Telephone Co. had requested the meeting to fulfill the requirements set forth from the FCC and ONAP, I gave him a short overview of why this order was created for communication companies that serve reservations and tribal members in their service area. I also wanted to affirm Mr. Head that Grand is working to assure that all of Cherokee Nation businesses and tribal members have access to any service available in our exchanges.

The first item of discussion was concerning the assessment and deployment planning for any communication services Grand Telephone could provide Cherokee Nations present and future business and residential members in our service area. There was discussion about the new Sam Hider Clinic that was scheduled to be built in Jay. I informed Mr. Head that Grand Telephone was a third generation family owned telephone company and not AT&T. That we wanted to work with and provide CN any service they needed for the new clinic and would be providing that service with fiber optics. I also told him that I appreciated CN as a customer and the opportunity Grand had to provide communication service for them at their places of business along with residential members having voice service. Mr. Head said he was thankful to know about Grand and would be looking forward to working with us and was glad to hear CN was such a good customer.

Second we talked about the feasibility and sustainability plan and marketing services for Grand and the tribal members in our area. I informed Mr. Head that Grand was able to provide voice and broadband service to any tribal member in our area because of the ongoing work to put fiber optics to all of our remotes in the rural area. We discussed the fact that if Grand was not providing a service that a tribal business or member needed we would be glad to investigate to determine what needed to be done to meet any need. I also told him of one of our latest projects of extending our fiber and copper facilities in the Kenwood Reservation. I stated that at the present time there were no customers living along the new route but had provisioned the cable to offer service if any tribal members were to build homes in that area within our exchange. We also discussed Lifeline for those tribal members that qualify. Mr. Head was very excited about this program because he was not aware of the reduced rate on local service that would be very helpful to provide voice service for tribal members. Jacob explained how the program worked and the discount that qualifying customer received. I let him know that Grand was required to keep the Lifeline information posted on our company website, DHS and Health Department. I asked if there was a place at the Sam Hider Clinic that the Lifeline information could be posted so tribal members could be aware of the program. Mr. Head was very pleased to find out about our desire to promote this service and that Lifeline could possibly make it affordable for tribal members to have broadband in their homes that currently are not financially able. I told him about the beta programs of the FCC creating a similar program in the future that would work the same way with broadband by give qualifying customers the ability to have broadband at a discounted rate. I also told him that if I heard anything from Washington and the FCC I would be sure and pass the information on to him.

Third we discussed right of way and easement issues between Cherokee Nation and Grand Telephone. I informed Mr. Head that I had been very pleased and thankful for the help and work that had been coordinated through the real estate department at Cherokee Nation. We have had in the past and are still working with Mr. Joel Bean on easement and right of way projects. These easements and right of way agreements help our construction contractor in the continued effort

to bury fiber and copper cable so that Grand can offer any communication service to tribal members in our exchange. I let Mr. Head know how much I appreciated Cherokee Nations willingness to provide Grand with easements and right of ways allowing us the benefit to bury cable in areas that help make our construction jobs easier and cables more accessible to make repairs when needed.

Finally at the close of our meeting I reinforced the importance of Grand Telephone's goal and desire as the communication company to provide any service to tribal residents in the tribal area that Grand serves. Mr. Head asked if he could keep the template we had provided and that he would forward the document to his IT personal and will ask them provide responses and answers to each of the sections so that he could send us a final copy. I told him that we had made the extra copy for his files and that we would appreciate it very much if he could provide the information allowing Grand to fulfill it requirements with the FCC and ONAP along with being a better partner for Cherokee Nation. Jacob and I thanked Mr. Head for taking the time out of his busy schedule to visit with us then told him we looked forward to working with him and Cherokee Nation in the future.

Rex Brixey, General Manager


Grand Telephone Co. Inc.

Rex Brixey

From: Charles Head <charles-head@cherokee.org>
Sent: Wednesday, January 09, 2013 12:47 PM
To: Rex Brixey
Subject: Re: thank you for your time

Thanks, I look forward to working with you. ch

From: Rex Brixey <brixey@grand.net<<mailto:brixey@grand.net>>>
Date: Wed, 9 Jan 2013 09:37:51 -0600
To: Microsoft Office User <charles-head@cherokee.org<<mailto:charles-head@cherokee.org>>>
Subject: thank you for your time

Charles

Just want to let you know how much Jacob and I appreciate you taking the time to visit with us yesterday. I look forward to getting the information from your IT personal and if they have any question concerning the template I left with you please let them know I am available to help with any issues they come up with. Since Jacob is Grand Telephones Public Relations representative I will have him contact the Sam Hider Clinic to find out where he can post the Lifeline information we talked about. I will keep you posted if there are any changes or modifications to this program that come out of Washington D.C. that can be helpful to those who qualify. Hope you have a great day and thank you again.

Rex Brixey
Grand Telephone Co. Inc.
918-253-4231

Jacob Wiese

From: Jacob Wiese <wiese@grand.net>
Sent: Thursday, January 17, 2013 4:10 PM
To: 'charles-head@cherokee.org'
Cc: brixey@grand.net
Subject: Grand Telephone - Lifeline Poster

Secretary of State Head,

Just wanted to let you know that we were able to post signs in three different Cherokee Nation offices in Jay. To let people know about the Lifeline program we offer.

It was a pleasure meeting you on Tuesday and I hope that we can be of assistances to you and to Cherokee Nation.

Should you or Cherokee Nation need our help or services, please don't hesitate to contact me, I can be reached at 918.253.4231 or email wiese@grand.net.

Thank You,
Jacob Wiese

Jacob Wiese, Public Relations
Grand Telephone Company
Omni III Cable TV
Grand Lake Telecommunications
918-253-4231 – Voice
918-253-8024 - Fax
wiese@grand.net

*Do not fear, for I am with you; do not anxiously look about you,
For I am your God, I will strengthen you, surely I will help you.
Isaiah 41:10*

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GRAND TELEPHONE COMPANY, INC. (SAC 431994)

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY